ANDERSON KILL P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020

TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733

www.andersonkill.com

Jerry S. Goldman, Esq. Jgoldman@andersonkill.com 212-278-1569

Via ECF and Hand Delivery

January 31, 2020

The Honorable Sarah Netburn U.S. Magistrate Judge Thurgood Marshall United States Courthouse 40 Foley Square, Room 430 New York, NY 10007

Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN);

Jessica DeRubbio et al. v. Islamic Republic of Iran, 18-cv-05306 (GBD) (SN)

Dear Judge Netburn:

I represent plaintiffs in the above-referenced matter. Yesterday, we filed a letter with the Court requesting that the Court not enter a judgment on behalf of the Estate of Edward F. Geraghty. MDL ECF No. 5790.

Enclosed for the Court's convenience is a revised Proposed Judgment in *DeRubbio* removing the Estate of Edward F. Geraghty from Exhibit B. We respectfully request that the Court use this Proposed Judgment if and when issuing a Judgment in the *Derubbio* case in lieu of the Proposed Judgment submitted on January 15, 2020. MDL ECF No. 5559.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jerry S. Goldman
Jerry S. Goldman, Esq.

Enclosure

cc: The Honorable George B. Daniels
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007
via Hand Delivery

All counsel via ECF

New York, NY ■ Los Angeles, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA